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January 11, 2023

Hon. Sidney H. Stein
United States District Court
U.S. Courthouse
500 Pearl Street
New York, N.Y. 10007

Re: United States v. Cheedie, et al
19 Cr. 833 (SHS)

Dear Judge Stein:

I represent defendant Shane Hanna in the above-referenced matter. I write today to request a modification of Mr. Hanna's bail conditions so as to allow him to attend a marketing conference in connection with his CBD business that is being held in Las Vegas, Nevada from January 23 to January 25, 2023. Mr. Hanna is a resident of Phoenix, Arizona and is currently at liberty pursuant to a \$250,000.00 appearance bond co-signed by one financially responsible individual and one serving as moral suasion. He is under the supervision of Pretrial Services in the District of Arizona.

The conference is called Affiliate Summit West and will feature 100 speakers, workshops and networking opportunities. If approved, Mr. Hanna would drive from Phoenix on January 22, 2023 and return to Phoenix by automobile on January 25, 2023. While in Las Vegas Mr. Hanna will stay with his brother-in-law, Jonathan Cerda, who resides in Las Vegas.

District of Arizona Pretrial Services Officer Gretchen White has been provided with Mr. Cerda's address and the details of the travel plans referred herein and has no objection to the proposed trip. The United States Attorney's Office per A.U.S.A. Sebastian Swett deferred to Pretrial Services regarding this request.

Accordingly, it is respectfully requested that the Court grant the appearance bond modification sought herein while all other conditions of release remain in effect.

Thank you for your consideration to this application.

Respectfully submitted,


Richard H. Rosenberg

cc.: Pretrial Officer Gretchen White
A.U.S.A. Sebastian nSwett